"substantially improved" and is only "sporadic." *Affidavit of John Fury,* Docket 6863-U, at ¶ 7 (Feb. 25, 2002). This view is echoed by e.spire, which indicated that it has not had any "significant problems" with the premature disconnection of customer service during UNE-P conversions. *Affidavit of Renee Terry,* Docket 6863-U, at ¶ 3 (Feb. 25, 2002).

Both WorldCom and AT&T have presented evidence that they say reflects that customers losing dial tone during UNE-P conversions are a "systemic problem." *Affidavit of Sherry Licthtenberg,* Docket 6863-U, at ¶ 23 (Feb. 25, 2002); *Joint Affidavit of Jay Bradbury & Bernadette Seigler,* Docket 6863-U, at ¶¶ 10-12 (Feb. 25, 2002). The Commission respectfully disagrees.

The most recent evidence submitted by WorldCom appears to continue overstating the frequency of lost dial tone during UNE-P conversion by including service problems that are unrelated to the conversion or BellSouth's use of a "D" (or disconnect) order and an "N" (or new) order. For example, WorldCom indicates that between May 2001, when it launched local residential service in Georgia, and January 2002, "it has received reports from 6,712 customers who have lost dial tone," although WorldCom does not provide the total number of customers served during this period. *Affidavit of Sherry Licthtenberg,* Docket 6863-U, at ¶ 21 (Feb. 25, 2002). While 6,712 customers is a significant number, WorldCom's data indicates that only 381 of these customers lost dial tone within five days of the UNE-P conversion, which is a more relevant time period in evaluating the conversion process. According to WorldCom 2,474 customers lost dial tone "within thirty days of being migrated to MCI" and, although WorldCom does not say so, it appears that the remaining 4,238 customers lost dial tone more than thirty days after the UNE-P conversion. The Commission does not understand, and WorldCom has failed to explain, how the use of N and D orders would cause a customer to lose dial tone thirty or more days after the conversion.

The data provided by AT&T is equally unpersuasive. While claiming that it has experienced "numerous loss of service problems and additional UNE-P provisioning problems due to BellSouth's inadequate migration process," AT&T points to only 81 instances of "outages or impaired service" that occurred within 72 hours of the conversion over a five-month period. *Joint Affidavit of Jay Bradbury & Bernadette Seigler,* Docket 6863-U, at ¶¶ 10-12 (Feb. 25, 2002). Like WorldCom, AT&T does not provide the total number of customers that migrated to AT&T during this time period, which makes it impossible for the Commission to determine the relative impact of the conversion process about which AT&T is complaining. It is clear that the 81 instances include customers in Florida as well as Georgia, although the underlying data furnished by AT&T provides little detail.

The data provided by AT&T shows clearly that only 15 of the 81 instances cited by AT&T actually involved a loss of dial tone. *Joint Affidavit of Jay Bradbury & Bernadette Seigler,* Docket 6863-U, at ¶ 11, Exhibit JMB/BS-1 (Feb. 25, 2002). The remaining 66 instances involved "impaired service," although AT&T does not explain how each customer's service was "impaired" or how such impairment was caused by BellSouth's use of N and D orders. In any event, the Commission is not convinced that 15 incidents of lost dial tone over five months (and in two states) is indicative of an "inadequate migration process" by BellSouth.

In conclusion, the Commission believes that BellSouth has adequately resolved any concerns about its manual handling of CLEC orders. The evidence in the record establishes that BellSouth's flow-through rates and service order accuracy have improved and its electronic ordering capabilities have expanded. At the same time, BellSouth's performance in returning timely Reject notices and Firm Order Confirmations ("FOCs") on LSRs requiring manual handling continues to be very good. Given this evidence, the Commission does not believe that CLECs' ability to compete in Georgia is adversely affected by BellSouth's manual handling processes.

(4) <u>OSS Testing and Development</u>

The DOJ has expressed concern about the adequacy of the testing environment BellSouth offers for its electronic interfaces as well as the responsiveness of BellSouth's Change Management process. *Evaluation of the United States Department of Justice,* at 26. The FCC Staff also voiced concern about the Change Management process.[18]

With respect to BellSouth's testing environment, the Commission believes that BellSouth has adequately addressed the DOJ's concerns. In particular, BellSouth has submitted evidence establishing that the testing environment in CAVE is sufficiently separate from BellSouth's production environment, even though CAVE uses the production environment service order processor. *See Joint Supplemental Affidavit of William Stacy, Alphonso Varner, and Ken Ainsworth,* CC Docket No. 02-35, ¶¶ 135-144. According to BellSouth, WorldCom is the only CLEC that has raised any question about this arrangement, and BellSouth has persuasively refuted WorldCom's allegations that production transactions were sent to WorldCom's test environment. *Id.* The Commission finds it noteworthy that, based on the evidence provided by the parties, vendors and other CLECs have been able to make successful use of CAVE without "test

[18] *See* Statement of FCC Chairman Michael Powell on Withdrawal of BellSouth 271 Application (Dec. 20, 2001); Letter from James G. Harralson to Magalie Salas, CC Docket No. 01-277 (Dec. 20, 2001).

and production transactions [becoming] mixed up ...." *Evaluation of the United States Department of Justice,* at 27.

BellSouth also has resolved the DOJ's concern about the testing of DSL orders in CAVE and about CLECs' ability to test the Local Exchange Navigation System ("LENS") in CAVE. *Evaluation of the United States Department of Justice,* at 28. According to a Carrier Notification Letter issued on November 7, 2001, the testing of DSL orders in CAVE was made available with Release 10.3 in December 2001. In addition, as set forth in a Carrier Notification Letter issued on January 2, 2002, BellSouth is currently beta testing LENS in CAVE with two CLECs, and full testing availability for LENS in CAVE will be available with the deployment of Release 10.4 in March 2002. *See Joint Supplemental Affidavit of William Stacy, Alphonso Varner, and Ken Ainsworth,* CC Docket No. 02-335, ¶ 144, Exhibit SVA-50. The Commission believes that these enhancements to CAVE provide more than adequate assurance that "BellSouth's testing environment supports local competition in Georgia and Louisiana." *Evaluation of the United States Department of Justice,* at 28.

BellSouth's Change Management process has been the subject of considerable discussion in this proceeding and in proceedings currently before the Commission. As previously indicated in its Comments and Reply Comments, the Commission believes that, although the process can be improved, the CCP is an effective means by which BellSouth communicates with CLECs regarding the performance of and changes to the OSS that affect interconnection and market access. *Reply Comments of the Georgia Public Service Commission,* CC Docket No. 01-277, at 18-19.

As part of its ongoing review of the existing performance measures in Docket 7892-U, the Commission is conducting a comprehensive examination of the CCP. This examination consists of two phases. In the first phase, the industry was directed to propose additional measurements by which BellSouth's CCP performance can be monitored. In that regard, the industry has proposed, and the Commission Staff has agreed to add the following three additional CCP measures to the SQM: (1) Measure CM-6, which captures whether CLECs receive timely correction of BellSouth software defects; (2) Measure CM-7, which captures the percent of change requests (other than Type 1 or Type 6 Change Requests) submitted by CLECs that are accepted or rejected by BellSouth with 10 business days; and (3) Measure CM-8, which captures the percentage of Change Requests (other than Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by BellSouth based on the reasons specified in the CCP. These additional measures will allow the Commission to ensure that BellSouth corrects software defects and handles change requests in a prompt and efficient manner.

The second phase of the Commission's examination of the CCP involves consideration of changes to the current Change Management process. Under the schedule established by the Commission, a coalition of CLECs filed on January 25, 2002 proposed changes to the CCP, to which BellSouth responded on February 15, 2002. The Commission is currently reviewing these proposals, which should provide a framework by which the industry can work together to reach agreement on ways to improve the Change Management process. The Commission notes that BellSouth has indicated its support for a number of the modifications proposed by the CLEC Coalition and has made specific proposals to address CLEC concerns about the scope of the CCP, the length of time it takes to implement certain change requests, and the adequacy of the prioritization process.[19]

The Commission believes that BellSouth has made a good-faith effort to improve the prioritization and implementation of change requests through the CCP, which were issues raised by the DOJ. *Evaluation of the United States Department of Justice,* at 29. First, in response to CLECs' concern about BellSouth's releases and the status of implementing the CLECs' highest priority change requests, BellSouth began distributing to CCP members in late 2001 a complete schedule for release implementation for the year, which identifies each release, the date for which the release is scheduled, and the change requests included within each release. BellSouth also began distributing a report outlining the status of each of the "top 15" change requests as prioritized by the CLECs. BellSouth has committed to continuing to provide these reports on an ongoing basis.[20]

Second, in response to CLECs' criticisms of BellSouth's performance in implementing top priority change requests, BellSouth has committed to implementing in 2002 the CLECs' current top 15 change requests, many of which are currently scheduled for implementation this year. BellSouth also has committed to implementing highly prioritized items on a timely basis consistent with available resources by proposing to the CCP a process by which 40% of BellSouth's annual release capacity would be allocated for implementing CLEC change requests and/or CLEC-driven regulatory mandates. Although this proposal was presented to the CCP, the participating CLEC members

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[19] Docket 7892-U, BellSouth Telecommunications, Inc.'s Response to CLEC Coalition Comments.

[20] Docket 7892-U, BellSouth Telecommunications, Inc.'s Response to CLEC Coalition Comments.

declined to vote on certain critical aspects of BellSouth's proposal, electing instead to present release capacity proposals to this Commission as part of its ongoing evaluation of the Change Management process.

Based on the evidence in the record, the Commission reiterates its prior conclusion that the CCP is an effective systems change management process to which has adhered over time. Additionally, this Commission remains committed to the ongoing success of the CCP as required by Section 271. This commitment is only underscored by the CCP improvements described above and the ongoing evaluation of the Change Management process.

B. Performance Measures and Data Integrity

Both the FCC Staff and the DOJ expressed concern about the reliability of BellSouth's performance data. *Evaluation of the United States Department of Justice,* at 30-38.[21] The Commission readily acknowledges that the FCC must "assure itself that it can be confident of the reliability of any performance data" that is material to the FCC's review. *Id.* at 38. However, the Commission believes that such assurances have been and continue to be provided.

In response to concerns about the reliability of BellSouth's performance data, the Commission Staff directed KCI to file with the Commission a detailed interim report outlining the status of the Georgia third-party test. KCI filed this Interim Status Report on February 11, 2002. This report confirms the thoroughness of KCI's efforts in auditing BellSouth's performance data and should provide the FCC ample assurance of the reliability of BellSouth's performance data.

[21] *See* Statement of FCC Chairman Michael Powell on Withdrawal of BellSouth 271 Application (Dec. 20, 2001); Letter from James G. Harralson to Magalie Salas, CC Docket No. 01-277 (Dec. 20, 2001).

First, as set forth more clearly in KCI's Interim Status Report, KCI has conducted two audits of BellSouth's performance data and is currently in the midst of a third audit. Each of the first two audits was comprehensive in scope, addressing everything from BellSouth's data collection and storage practices to data replication and data integrity. There are only three open exceptions related to the first audit, none of which, in the Commission's view, raises any serious concern about the reliability of BellSouth's performance data. The second audit has been completed with all test criteria satisfied and no open exceptions. That KCI has been scrutinizing BellSouth's performance data for almost three years and has nearly completed two audits with relatively few open issues is strong evidence that BellSouth's performance data are "meaningful, accurate, and reproducible." *Evaluation of the United States Department of Justice,* at 31.

Second, as BellSouth points out, the third audit involves a review by KCI of many of the same measures that were audited in the first two audits, to the extent there has been a change in the implementation of the measure or a change in the measure's business rules or levels of disaggregation. While it is worthwhile for KCI to re-examine previously audited measures under such circumstances, changes such as the addition of disaggregation levels should not detract from the fact that the measure has already been audited by KCI at least once as part of the first two audits.

Third, KCI has made considerable progress toward completion of the third audit of BellSouth's performance data. As explained in greater detail in the Interim Status Report, KCI has nearly completed testing in several of the test domains, such as Data Collection and Storage (90% complete) and Change Management (85%). Even for those test domains in which the testing is not quite as far along, such as Data Replication, which is 52% complete, the issues that KCI has identified to date are limited in scope. For example, according to the Interim Status Report, there were five open exceptions under the Data Replication test domain as part of the third audit as of February 11, 2002; however KCI has since filed closure reports for three of these exceptions.

Based upon review of KCI's Interim Status Report and the additional exceptions issued by KCI since its report was filed, the Commission finds no evidence of any significant data integrity problems or any issue that undermines the overall reliability of BellSouth's performance data. The Commission's views in this regard should be entitled to some amount of deference given that this Commission established the first performance measures and instituted the first performance reporting requirements for BellSouth in its region. This Commission and its Staff have been reviewing BellSouth performance data for almost four years and have been active participants in the KCI third-party metrics test for more than two years.

This active participation continues to this day. The Commission recently completed nine days of industry workshops and conferences in Docket 7892-U as part of the Commission's regular review of the performance measurements and enforcement plan. These workshops involved representatives of the industry and the Commission Staff reviewing each existing performance measure, including proposed changes to the business rules, calculation methodology, the applicable benchmark or retail analogue, and disaggregation levels for each measure, as well as considering new proposed performance measures. Whatever revisions to the performance measurements plan this Commission ultimately adopts, BellSouth's performance data will continue to be subject to oversight by this Commission as well as annual audits by the CLECs. Under such circumstances, the FCC should find, consistent with its prior precedents, that such "review and monitoring mechanisms provide reasonable assurance that the data will be reported in a consistent and reliable manner." *See Bell Atlantic-NY Order,* ¶ 442.[22]

If the prior proceedings in CC Docket No. 01-277 are any indication, the FCC will likely hear from CLECs complaining about the integrity of BellSouth's performance data. Such complaints must be put in proper context. In particular, as part of the recent workshops in Docket 7892-U, this Commission invited any party with concerns about the integrity of BellSouth's performance data to bring such concerns to the Staff's attention so that the issues could be discussed by the industry. Other than AT&T, no party accepted the Commission's invitation, and AT&T was the only party to raise a question about the "integrity" of BellSouth's performance data. Furthermore, no CLEC has yet availed itself of the Commission's performance measures and reporting dispute resolution procedures, which have been in place for almost four years and which remain available to this day. Under the circumstances, the FCC should decline to give credence to any data "integrity" issues that are raised for the first time in this proceeding; otherwise the FCC's admonition that carriers should bring issues "to the attention of state commissions so that factual issues can be resolved before a BOC applicant files a section 271 application" will have no meaning. *Verizon-MA Order,* ¶ 147.[23]

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[22] The Commission's recent workshops should resolve the DOJ's concerns about the adequacy of several of BellSouth's performance measures. *See Evaluation of United States Department of Justice,* at 35-37 (expressing concern "about the validity of a number of measures that should be revised to provide regulators and competitors with meaningful performance data"). Many of the issues raised by the DOJ were addressed during the workshops, and parties proposed certain revisions consistent with the desires of the DOJ. With respect to some measures, however, no participant in the workshops advocated the changes recommended by the DOJ.

[23] Although during the workshops AT&T raised what it characterized as data "integrity" issues, many of AT&T's issues had nothing to do with the integrity of BellSouth's performance data. Rather, they related to complaints about certain exclusions in the SQM or the manner by which BellSouth had implemented the Commission's orders in Docket 7892-U. Other issues raised by AT&T appear to

II. CONCLUSION

The Georgia Public Service Commission remains satisfied that BellSouth has complied with all of its obligations under Section 271 and FCC precedents. The recent OSS enhancements implemented by BellSouth at this Commission's direction and the additional evidence submitted by BellSouth concerning OSS, performance data integrity, change management, and related issues should satisfy any lingering question about BellSouth's compliance. The local market in Georgia is irrevocably open to competition, and CLECs are aggressively and successfully competing against BellSouth using all three modes of competitive entry. Accordingly, the Commission urges the FCC to approve BellSouth's application for in-region, interLATA authority in Georgia so that residents of the State can enjoy the benefits of full competition.

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represent an apparent lack of familiarity with BellSouth's SQM. In any event, each of the issues raised by AT&T either has been or is being resolved as part of the workshops in Docket 7892-U.

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EXECUTIVE SECRETARY
G.P.S.C.

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	)	
	)	
CONSIDERATION OF BELLSOUTH TELECOMMUNICATIONS, INC.'S ENTRY INTO INTERLATA SERVICES PURSUANT TO SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996	)))))))	**DOCKET NO. 6863-U**

WORLDCOM'S PETITION TO ADDRESS OSS, CHANGE MANAGEMENT AND DATA INTEGRITY ISSUES

COMES NOW, WorldCom, Inc. ("WorldCom") and hereby files this Petition to Address Operations Support Systems ("OSS"), Change Management and Data Integrity Issues. Since WorldCom's subsidiary MCI launched its Georgia local residential service in May 2001, it has been attempting to clear a number of significant hurdles that have impeded its progress in selling service to Georgia consumers. MCI has sought to work through these concerns with BellSouth Telecommunications, Inc. ("BellSouth") and has raised many of them with the Commission in this proceeding. The Commission attempted to remedy four of those problems in its October 19, 2001 Order in this docket ("October 271 Order"), in which it ordered BellSouth to implement solutions by specified dates. BellSouth has failed to implement the Commission's directives, missing deadlines and delivering system fixes that fall short of what the Commission required. As MCI's launch has proceeded, new issues have emerged that MCI has not been able to resolve with BellSouth. Now that BellSouth has withdrawn its Georgia 271 application at the FCC, it is time to take stock of BellSouth's performance and drive resolution of key remaining problems.

Toward that end, WorldCom proposes that the Commission hold expedited workshops and such other proceedings as the Commission deems appropriate to deal with OSS, change management and data integrity, the three areas that emerged as major concerns during the 2001 271 process.

I. INTRODUCTION

On October 2, 2001, the Commission voted to recommend approval of BellSouth's 271 application, and also required BellSouth to implement a number of improvements to its OSS. On that same day, BellSouth filed its Georgia and Louisiana 271 application with the FCC, contending among other things that it had met the fourteen point checklist outlined in Section 271 of the Telecommunications Act of 1996 ("Act"). CLECs including WorldCom filed comments and declarations with the FCC pointing out in detail why BellSouth was failing to provide nondiscriminatory access to its OSS and otherwise had not met the 271 checklist. WorldCom's comments focused on MCI's Georgia launch and the problems MCI has experienced during its roll out of local service here, especially problems with BellSouth's OSS and its change management process. On December 20, 2001, in the face of certain rejection by the FCC, BellSouth withdrew its 271 application.

In a statement issued on the day of BellSouth's withdrawal, FCC Chairman Powell noted that "[t]he FCC cannot approve such applications by the Bell Companies unless they satisfy the requirements of section 271 of the Communications Act." He further stated that

> despite extensive conversation and collaboration with the FCC, questions remain regarding whether BellSouth has satisfied the rigorous requirements of the statute and our precedents, <u>including the adequacy of the company's operational support systems, the integrity of its performance data and its change management process, and related issues.</u>

(Emphasis added.) BellSouth has contended that the FCC merely requested more information from BellSouth and that BellSouth intends promptly to refile its application. BellSouth's December 20 press release on its withdrawal stated that its new application will include new information "on pre-ordering and order process integration, service order and data accuracy, the order due date calculation process and the collaborative process for implementing software changes to the support systems used by CLECs."

WorldCom agrees the areas identified by Chairman Powell and BellSouth need to be addressed. But they should be addressed first by this Commission, not the FCC. On this point the FCC has been quite clear, specifically addressing BellSouth's tactics during its first round of 271 filings more than three years ago:

> While we commend BellSouth for making significant improvements over the past eight months since we issued the *First BellSouth Louisiana Order*, BellSouth has filed a second application for Louisiana without fully addressing the problems we identified in previous BellSouth applications. This problem is particularly evident in BellSouth's provision of operations support systems. Because BellSouth does not satisfy the statutory requirements, we are compelled to deny its application for entry into the interLATA long distance market in Louisiana. <u>In this regard, we caution that the Commission expects applicants to remedy deficiencies identified in prior orders before filing a new section 271 application, or face the possibility of summary denial.</u>

In re Application of BellSouth Corp., BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121, Memorandum Opinion and Order ¶ 5 (rel. Oct. 13, 1998) ("*Louisiana II Order*") (emphasis added) (footnotes omitted). The FCC also has addressed the responsibilities of state commissions with respect to subsequent 271 applications:

> We fully acknowledge and are sensitive to limitations on state commissions' resources for purposes of developing their

> recommendation on a BOC's 271 application. We believe, however, that in making its recommendation on a BOC's section 271 application, a state commission may assist us greatly by providing factual information. When a BOC files a subsequent application in a state, it is important for the state commission to provide the factual information gathered and relied upon by the state commission concerning changes that have occurred since the previous application was filed. Thus, for subsequent applications, we encourage state commissions to submit factual records, in addition to their comments, demonstrating that: (1) the BOC has corrected the problems identified in previous applications; and (2) there are no new facts that suggest the BOC's actions and performance are not longer consistent with the showing upon which this Commission based any determination that the statutory requirements for certain checklist items have been met.

Id. ¶ 21 (emphasis added).

The only difference between the BellSouth's Georgia 271 application and its first Louisiana application is that in this case BellSouth chose to withdraw its application at the last moment rather than face yet another FCC 271 rejection order. As a result, the Commission does not have before it an FCC order outlining in detail where BellSouth fell short in its application. Indeed, the obvious reason BellSouth withdrew the application was to prevent such a list of problems from being made public so it could put its own spin on why withdrawal was necessary. But there is no doubt concerning the main areas that must be addressed: both Chairman Powell's statement and BellSouth's press release identified OSS, change management and data integrity as key. The *Louisiana II Order* requires BellSouth to address these areas before it refiles, and "encourages" this Commission to develop a factual record demonstrating that these areas have been appropriately addressed and that no new problems have emerged. In this Petition, WorldCom proposes a constructive way to go about complying with the *Louisiana II Order*.

II. MCI'S LOCAL LAUNCH

Georgia remains the only state in BellSouth's service territory where MCI has been able to roll out local residential service throughout a significant portion of BellSouth's service territory.[1] Georgia consumers have responded to MCI's product offerings -- MCI continues to submit more than 1000 local service requests per day for local residential service. MCI's order volume is still less than it could be if BellSouth's OSS functioned well, but at present MCI's launch represents the high water mark in BellSouth's region. To put that sales volume in perspective, in November 2001 LSRs submitted by MCI for local residential service constituted 80% of the EDI orders for UNEs and 33% of all UNE orders throughout BellSouth's entire region. It also constituted approximately half of all the EDI orders for all local products submitted in the nine BellSouth states. These numbers reveal that not only is MCI the only company to launch this type of local residential business in Georgia, but that its Georgia launch is the only one of its kind anywhere in BellSouth's territory. Certainly the Commission deserves credit for being the first and only commission in the Southeast to make such a local service launch possible. Georgia consumers have been the beneficiaries of the Commission's vision and its steadfast determination to lay the groundwork for real local residential competition.

But clearing the way for launch is only the first step, albeit a crucial one. MCI's experience in other states where it has begun providing higher volume local residential service has been that after launch it uncovers myriad OSS problems and flaws that must be corrected. That has been the case in Georgia as well, but unfortunately MCI has found that BellSouth's systems are so riddled with problems that it must devote a disproportionate share of its

[1] MCI currently provides service throughout zone 1 in Georgia, but is not able because of UNE pricing to provide service in the rest of the state. MCI recently launched its local residential service in Florida, but there MCI has been able to offer service only on a limited basis because of Florida's UNE prices.

information technology resources to fixing them. This undue expense is a significant competitive barrier.

BellSouth's OSS problems also affect consumers directly. MCI has seen a high rate of Georgia customers leaving MCI and returning to BellSouth for local service. Often the problem is that the customer has had a bad experience during his or her migration to MCI – perhaps a provisioning delay or the loss of dial tone for some period after migration. No doubt in many cases a poor provisioning experience combined with BellSouth's aggressive win-back efforts have been enough to convince the customer not to experiment further with MCI's new service. A competitive marketplace always will involve some degree of turnover as customers make choices and search for the best deals. But when the incumbent provider uses a substandard OSS process as a competitive weapon, regulatory action is necessary. MCI has found that only with commission support is it possible to prompt a Bell company to undertake the arduous process of dealing with the many OSS problems that surface during service roll out and – just as importantly – implementing an effective process for addressing those problems on an ongoing basis. Given the seriousness of the problems MCI has encountered, it is critical that they be addressed quickly, in expedited workshops and proceedings.

III. OUTSTANDING ISSUES MUST BE ADDRESSED

WorldCom proposes that the Commission move quickly to address the problem areas identified in Chairman Powell's statement – OSS, change management and data integrity. WorldCom respectfully submits that workshops and other appropriate proceedings should address outstanding issues that are identified in each of these three areas. Experts should be required to attend so workable solutions can be developed and implemented under the Staff's supervision. Unresolved issues should be submitted to the Commission so it can resolve them and order implementation schedules as appropriate. Given its strong interest in improving OSS as soon as possible, WorldCom is prepared to address all identified problems on an expedited basis. A brief summary of the key issues from WorldCom's perspective follows.

A. OSS Issues

1. Migration by telephone number and name

In its October 271 Order, the Commission required "BellSouth to implement by November 3, 2001, migration by Telephone Number and name." The purpose of this improvement was to better integrate the pre-ordering and ordering processes, thus reducing BellSouth's high reject rate and improving flow through. BellSouth's implementation was both late and flawed. Its initial effort was accompanied by a number of glitches that delayed final implementation to November 17. Even then, unlike other Bell companies, BellSouth was not able to implement the functionality ordered by the Commission, but instead implemented migration by telephone number and street address number. This approach has lead to a significant problem. MCI obtains the customer's street address number from the Regional Street Address Guide ("RSAG") and transmits that number on the order, but BellSouth verifies the street address number against both RSAG and the Customer Service Record ("CSR") databases. If the street address number does not match both databases, BellSouth rejects the order, a not infrequent occurrence because the two databases sometimes do not match. When that is the case, the CLEC has no way of correcting the rejected order because there is no way to make the address on the order match both back-end databases. Currently, the only way for MCI to deal with the situation is to call BellSouth's Local Carrier Service Center to fix the problem, which takes about twenty-five minutes for each rejected order. A solution to this problem needs to be developed.

2. Parsed CSRs

In its October 271 Order, the Commission directed BellSouth "to implement fully fielded parsed CSRs by January 5, 2002." BellSouth has failed to comply with the Commission's Order. BellSouth issued its business rules for the parsed CSR late, and since implementation has flagged seventeen defects that are not scheduled for correction until February 2, 2002. More importantly, BellSouth again has not provided the full functionality that was ordered, because it is not providing "fully fielded" parsed CSRs. In November 2000, CLECs and BellSouth discussed implementation of the parsed CSR project. CLECs presented draft user requirements and the parties reached agreement on what would be included. Nearly a year later, in September 2001, BellSouth provided CLECs with documentation reflecting a parsed CSR product that was different than what CLECs had requested, even though BellSouth did not tell CLECs about any differences in the intervening months. Despite objections from CLECs, BellSouth proceeded to implement its revised version of CSR parsing rather than what CLECs requested and agreed to.

BellSouth's CSR parsing release failed to include nineteen fields in parsed format that were requested by CLECs in November 2000. BellSouth has stated that some of these fields are not part of the CSR and some cannot be parsed. But all of these fields are used on either the inquiry or response pre-order CSR transactions. For example, the company code and inquiry number are codes that CLECs transmit on the CSR inquiry. BellSouth must send those codes back on the response transaction to establish the proper handshake between the companies; yet BellSouth's documentation does not say BellSouth will return this information. Moreover, other

ILECs have been able to parse these fields and there is no reason to believe BellSouth cannot do so. And these fields are important. For example, BellSouth's implementation of parsed CSRs does not include end user name, unit number or hunting information.

The purpose of the parsed CSR is to integrate BellSouth's OSS and thus reduce rejects and improve flow through. But BellSouth has approached this project without regard for CLECs' stated needs or the interests of consumers, but rather with the intention of checking a box it perceives to be necessary for 271 approval. The Commission should not allow this tactic to succeed. It should supervise discussions between the parties that will upgrade BellSouth's parsed CSR so it is useful to CLECs. In the meantime, BellSouth should not be considered to have complied with the Commission's October 271 Order.

3. Single C Order process

The Commission directed BellSouth to adopt a single C order process in its back-end systems by January 2002 to eliminate at least part of the lost dial tone problem. But BellSouth has announced it will not implement this change until April. It also has stated that this change is not "CLEC impacting" and therefore will not be subject to a CLEC test period, nor will documentation explaining the changed processes be provided to CLECs despite the significant customer impact should these processes fail. Two percent of MCI customers continue to lose dial tone in the first thirty days after migration, and to date more than 5000 MCI customers have lost dial tone after migration. BellSouth's willingness to incur a $10,000 a day penalty rather than comply with the Commission's Order speaks volumes about BellSouth's unwillingness to devote resources to address OSS problems that harm Georgia consumers. BellSouth should be required to meet with CLECs and the Commission and rethink its cavalier approach to this serious problem.

4. Interactive Agent

Use of a Value Added Network ("VAN") delays transmission of orders, as well as FOCs, rejects, and completion notices between MCI and BellSouth – delays that are not captured in BellSouth's performance measures. Yet BellSouth, alone among the Bell companies, has refused to adopt Interactive Agent, the industry standard mode of transmission. WorldCom submitted a change management request for the Interactive Agent on September 26, 2000, but Interactive Agent has not been implemented and is not one of the upgrades BellSouth has scheduled for implementation during 2002. Unfortunately, it appears that Commission action will be required to force BellSouth to implement this industry standard.

5. Line loss reporting

About a month after MCI began its launch, it raised with BellSouth the issue of BellSouth's failure to provide complete line loss reports. Obtaining complete reports is critical because without a line loss report MCI does not know to stop billing a customer who has migrated to another company (in most cases, BellSouth). Because of this problem, thousands of former MCI customers have been double billed through no fault of MCI. MCI has received more than 1285 complaints of continued local billing since it launched service. After months of stonewalling, BellSouth finally provided missing line loss reports from October 1 through December 1, which included 2744 customers who had left MCI in those two months.[2] BellSouth still has not provided the data for customers who were left off the line loss reports

[2] Since then, BellSouth has implemented an interim process in which it provides additional line loss reports on a

prior to October 1, many of whom probably still are being double billed. BellSouth should be required to address this issue.

6. Billing problems

Not surprisingly, billing problems are among the last to be detected because of the lag between provisioning and billing. A number of billing problems have surfaced since MCI's launch began. MCI has found, for example, that six and a half percent of the lines for which MCI is billed do not include a billing telephone number, which prevents MCI from determining whether bills on these lines were proper. Another problem with BellSouth's wholesale bills is that BellSouth is not using the correct billing number to bill WorldCom for UNE-P usage. MCI requested that BellSouth fix this problem after MCI received its very first bill, but BellSouth still has not done so. MCI also has discovered that BellSouth has improperly routed tens of thousands of intraLATA calls through its own switches, rather than through the switches of the intraLATA carriers chosen by MCI's customers (generally MCI's long distance operation). This misrouting denies the customer service from the carrier of its choice and leads to a loss of revenue for the chosen intraLATA carrier. BellSouth itself identified "translation errors" as the cause of the problem. Finally, CLEC orders sometimes drop into various pending billing states requiring manual work to correct errors and complete the final step of the order before BellSouth's billing systems are updated – which leads to the potential for double billing. MCI has provided BellSouth numerous examples of orders for which MCI has received completion notices but for which BellSouth has not updated the CSR. MCI believes that in many instances, the cause of this problem is that orders have dropped into a billing discrepancy file, but since no

weekly basis.

one at BellSouth has answered MCI's questions about the systems and processes used in updating CSRs, it cannot determine whether this is the root cause of the problem.

The resolution of these billing problems is critical to MCI's business and to the experience of MCI's customers. The Commission should require BellSouth to give these issues the attention and resources they are due.

B. Change Management

Change Management is critical for CLECs. Without a change management process that enables CLECs to obtain needed improvements, allows them effectively to test that changes work and that the changes do not cause downstream difficulties (including rejects), and ensures rapid repair of any defects that are introduced by changes, CLECs lose their ability to compete effectively. BellSouth lacks such a process. BellSouth largely ignores CLEC input on what changes are required, does not perform effective initial release testing to weed out defects in new releases, fails to provide notice to CLECs of many key changes, and excludes key functions, such as billing, from the change management process altogether. Moreover, change requests often take many months or even years before BellSouth even presents them to CLECs to be prioritized; and once change requests are prioritized they take many months or years before they are implemented. Perhaps the biggest problem is that BellSouth simply implements far too few change requests. In 2001, BellSouth implemented only five prioritized change requests (four of them from CLECs), and it appears BellSouth plans to implement only twenty-five change requests (eleven of them from CLECs) in 2002. In contrast, from October 2000 to October 2001 Verizon implemented 170 prioritized changes. Verizon has developed a satisfactory change management process; BellSouth should be required to emulate Verizon's example.

As part of the performance measurement docket, Staff has required CLECs to red line BellSouth's change management process document by January 30, 2002 and BellSouth to respond by February 15. No decision has been made how to proceed once the red-line and response have been filed. WorldCom respectfully submits that a change management workshop should be scheduled after the filings to work through revisions to the change management process and also to review and seek improvements to BellSouth's implementation of that process. CLECs need a process that is fair, that is followed and that ultimately results in a higher volume of implemented change requests. Commission focus is necessary to accomplish these objectives.

C. Data Integrity

During the 271 proceedings before this Commission and the FCC, WorldCom chose to focus its advocacy on specific problems it has experienced with BellSouth, rather than criticisms of BellSouth's data. But in the areas of central concern to WorldCom, it is clear that BellSouth's data is not accurate – or at least does not accurately represent the underlying problems. For example, WorldCom has encountered flaws in BellSouth's flow through data and has found that BellSouth's reject data does match WorldCom's internal data. Also telling is that KPMG's testing of BellSouth's performance metrics in Georgia continues to find data problems. Obviously, if the Commission cannot rely on BellSouth's data, it cannot assess BellSouth's performance. The Commission should undertake appropriate proceedings to ensure that it can rely on the performance data being reported by BellSouth.